Comments on the "Managing Multiple Use in the Coastal Zone — A review of the Great Barrier Reef Park Authority" by J. F. Whitehouse, 1993. Commonwealth of Australia 1993

Reviewed by Pat Hutchings
Vice-President of the Australian Coral Reef Society

A review of the Great Barrier Reef Marine Park Authority (GBRMPA) was included within the Annual Portfolio Evaluation Plan of the former Portfolio of the Arts, Sport, the Environment and Territories (now the Department of Environment, Sport and Territories). The programme of evaluation is designed to provide an input into the decision making process of government and agencies and to provide a basis for determining their efficiency. The GBRMPA review was preceded by a review of Australian National Parks and Wildlife Service (ANPWS, now Australian National Conservation Agency, ANCA) by Mr Bruce McDonald which was published in 1989. It contained a range of recommendations impinging on the GBRMPA.

The review of the GBRMPA was begun in October 1991 and was undertaken by John Whitehouse a solicitor and Partner in Dunhill Madden Butler who was well acquainted with the workings of the Authority.

The terms of reference were to review the role, operations, and management programme of the GBRMPA, having regard to:

1. the objectives of the GBRMPA Act,
2. the Commonwealth's national and international responsibilities for protecting the GBR region and adjacent areas,
3. the Commonwealth's general environment, heritage, administration and budgetary policies,
4. alternative means of providing the required level of protection of the Great Barrier Reef region and adjacent areas,
5. the appropriateness and need for extending the role of GBRMPA in relation to other Australian marine protected areas,
6. relevant recent reviews of other Commonwealth agencies.

In particular the review was to address:

a. the efficiency and effectiveness of GBRMPA in undertaking its statutory functions

b. the approval process for actions in the Marine Park

c. the application of "user-pays" principle

d. the policies, goal and aims of GBRMPA

e. the need, if any, to amend legislation

f. administrative and other working arrangements

g. level and distribution of resources

h. any duplication and overlap between GBRMPA and other Commonwealth or Queensland agencies

i. relevance and conduct of the management programme in light of changing pressures on the environment of the GBR region and adjacent areas.

Since the GBRMPA was established under the *Great Barrier Reef Marine Park Act* 1975 it has zoned all parts of the Park, and the pressures on the area have escalated dramatically as usage continues to increase.

The Australian Coral Reef Society (ACRS) which represents over 300 coral reef scientists, made a detailed submission to this review, as did a wide variety of organizations at both local, State and Federal level as well as various interest groups and individuals.

Whitehouse should be congratulated on producing a clear and comprehensive review and a series of recommendations, some of which are already being implemented. The review should be read by all those interested in marine conservation in Australia not just those with interests in tropical reefal systems. ACRS has no special expertise to comment on parts of the review which deal with legislation and functions, financial or organizational management but takes this opportunity to comment on sections of the review addressing marine protected areas and conservation in Australia, proposals for an Australian Nature Conservation Authority and GBRMPA, conservation management, recreation, education and use of management, community interactions, co-ordination and external liaison, future directions and recommendations.

MARINE PROTECTED AREAS AND CONSERVATION IN AUSTRALIA

The rationale for the need to establish marine protected areas (MPA's) is that Australia's oceans are poorly known biologically but constitute areas of considerable biological diversity, and that the marine environment constitutes a new frontier where exploitation of economically valuable resources has only just begun. In general the major options for future use and management have not been compromised by previous actions, and the lack of private land tenure of marine resources and the limited lack of established exploitation, provides a unique opportunity to promote ecologically sustainable development. To date marine conservation and management in Australia have lacked a coordinated approach to planning and managing marine resources. For these reasons an enhanced role by the Commonwealth in marine conservation and management is required.

The ACRS strongly supports the enhanced role of the Commonwealth in developing MPA's but this can only be effective if the necessary resources are allocated. While this must not mean a reduced role for the states, the current piecemeal approach by many states is not working and a far more coordinated approach between states and the Commonwealth is required for adequate protection and management of the marine environment.

While many of the principles of managing terrestrial protected areas are applicable in the management of marine and estuarine protected areas, many important differences occur. These include:

1. the management paradigm is reversed. The marine environment is a matrix of naturalness impinged upon by areas of impact whereas terrestrial protected areas constitute a "closed cell of naturalness in a matrix of input". Managing a MPA requires the location and limitation of areas of impact.
2. a MPA is an open system, where circulating processes operate continuously and an event originating outside the MPA boundaries may affect populations and ecosystems within it.
3. patterns of energy exchange alter rapidly across a MPA in contrast to a terrestrial protected area.
4. because of the open nature of marine systems the concept of buffer zones protecting a core area of a MPA from impact are particularly important.
5. disturbances in MPA are generally dispersed by currents predominantly in one direction, whereas in a terrestrial protected area disturbances radiate from a point of impact.
6. while the removal of biota is generally precluded in terrestrial protected areas, in MPAs, particularly large ones, controlled exploitation of resources may be permitted.

These differences between the management of terrestrial and marine protected areas were well accepted in submissions to the inquiry. The submission of the Queensland Government encapsulated these comments well in the following statement: "Worldwide there is now a well developed system of terrestrial areas under some form of protective management. Methodologies to determine which terrestrial area should be preserved and how large they should be are relatively sophisticated. Because of the different characteristics of marine and terrestrial ecosystems, methodologies and techniques developed for terrestrial systems are often inapplicable to marine systems and development of methodologies for marine conservation requires specialist knowledge, skills and experience". ACRS strongly endorses this statement and is aware of the expertise and knowledge which has been progressively built up within the GBRMPA to make it a world leader in protecting and managing large area, tropical reefal systems.

A dissenting view was put in a document prepared by the former ANPWS "Marine Protected Areas: Guidelines and Recommendations for the Development of a National Representative System 1992". This suggested that generalizations about the sea as a semi-continuous open system dominated by downstream processes are oversimplifications. On this basis it argued that because of the linkage between marine and terrestrial systems separate agencies should not be developed for the management of marine and terrestrial environments. Consequently it argued that there should be one agency for the management of these areas together with estuarine environments. There were no other dissenting views that marine and terrestrial areas should be managed separately.

The Australian Committee for the International Union for the Conservation of Nature (ACIUCN) in its submission further clarified the key issues in the conservation and management of marine and estuarine areas (see pages 41–42 of the report) and Whitehouse endorses these as does the ACRS. In essence, what the ACIUCN submission seeks is for the adoption of an integrated approach to the management and conservation of Australian waters and to seek co-operative government action at local, state and federal levels to ensure the co-ordinated development of a national system of marine and estuarine protected areas. Similar recommendations were made at the Fenner Conference (1993) held in Canberra in 1991. The Resource Assessment Commission into the Coastal Zone Inquiry (1993) reached a similar conclusion.

Whitehouse noted that there had been a spirited debate as to the best means to achieve an integrated approach to the management and conservation of Australian waters. He observed that: "Much of it reflects attempts by rival agencies to stake out the terrain and augment bureaucratic power rather than to dispassionately analyse the advantages and disadvantages, the costs and consequences, and the likely achievability of the varying options". He further suggest that: "the continuing nature of the debate on management models for marine protected areas has perhaps constituted a substitute for more decisive action in implementation". Such attitudes are to be deplored and the environment must not be used as a political football.

On the evidence presented in this report, or known to ACRS, GBRMPA is an agency which is working well and fulfilling its charter. There is no evidence to support the need for a major reorientation of the Authority or its incorporation into any other agency.

THE METHODOLOGY OF SELECTING MPAs

The ACRS now takes the opportunity to explore the methodology of selecting MPAs as discussed by Whitehouse. While the GBR is enclosed within the GBRMP, many reefal areas in NW Australia have little or no protection. Similarly, many inter-reefal habitats and adjacent wetland habitats in northern Australia need to be managed and protected.

The "Guidelines for Establishing Marine Protected Areas" by Kelleher and Kenchington, published by IUCN in 1992, discuss the process of selection of MPA's and these are: the factors which should be taken into account; naturalness; biogeographic importance; ecological importance; economic importance; social importance; scientific importance; international or national significance and the practicality and feasibility.

While these criteria are reasonably well accepted, ANCA advocates a "scientific procedure" in its brochure entitled "Marine Protected Areas — Guidelines and Recommendations for the Development of a National Representative System" (1992). This is based on the premise that MPA's have in the past been selected as zoned or managed opportunistically on an ad hoc or political basis rather than on a scientific basis.

There are two questions at the core of the debate. 1. How much information is needed to establish and start the management of MPAs? 2. Is it appropriate to consider political and administrative information on the practicality or feasability of establishing successful management?

Mr Kelleher, the foundation Chairman of the GBRMPA, has commented that the practicality of a solely science-based approach to the development of a national representative system of MPAs has yet to be demonstrated. Such a methodology does not allow for adequate input of sociological and political feasability into the decision making process which is essential for establishing an operational system of MPAs. The GBRMP Act requires the Authority to take such factors into consideration.

A related question is whether it is preferable to have a series of small MPAs managed in isolation for protection or preservation of biological diversity or whether it is more effective to have multiple use resource management strategies which contain a variety of zones with varying levels of protection as occurs in the GBRMP. Whitehouse argues for the latter strategy resulting in a Marine Park representing a system of regional zones. These have no real equivalents in Australian terrestrial parks. The regional zones having levels of protection equivalent to terrestrial national parks through to zones with a high level of recreational and commercial extractive activities. These activities may occur provided that they are consistent with the principles of ecological sustainability. Variants of this approach have now been adopted in Belize, Indonesia and the UK. The approach provides a greater assurance that zones requiring high protection will actually receive it because the surrounding less protected areas function as buffers. In addition, activities within all zones can be regulated and changed should the need be demonstrated.

In the marine environment there can rarely be a physical buffer between highly protected and less protected areas. Much of the fauna migrates in and out of the protected zone. In contrast, terrestrial protected areas rarely have buffer zones and park authorities do not have control over activities occurring adjacent to park boundaries. This raises the question as to the efficacy of small isolated MPAs which have been established in some states. They may be important in protecting only a few species rather than a viable marine ecosystem if surrounding areas are polluted or over exploited. They may be subsequently incorporated into a broader marine management strategy. This raises the issue of the relative merits of a regional planning authority with responsibility for ensuring ecologically sustainable development as opposed to one with a more single focus on the preservation of biological diversity and natural processes. Stripped of the tension of current agencies and individuals, the question is whether an agency with a responsibility for multiple use can pay adequate attention to the issues of biodiversity? Whitehouse's report indicates that the GBRMPA has been successful in achieving multiple objectives. Some protection has been given to the entire reef with high levels to particular areas. In addition, the management regime enables the Authority to deal directly and authoratively with users including shipping, fishing, and tourism interests. I think it is clear that this is the correct strategy. The GBRMPA model is interactive but it must be stressed that management of large scale, multiple use marine park requires significant and ongoing allocation of funding and resources.

Whitehouse then considered whether the scope of the Authority should also cover other areas of Australia, as there is almost universal agreement that the model which GBRMPA has developed and implemented is working. There are arguments for and against but basically he concludes the model could be used elsewhere and that the GBRMPA should retain its current identity and one of the reasons that it works well is that it is located in Townsville close to its area of operation. Whitehouse considers that the Authority has developed the expertise for the region and a good working relationship with the users of the park. If the Authority was to be extended to other parts of Australia it would have to be based in Canberra away from the actual parks it was trying to administer. Also, the Authority could not focus entirely on the GBR but at times would be considering for example the management of temperate reefs. Whitehouse's views are supported by several government Departments and also by the Chairman of the GBR Consultative Committee. Also at risk in modifying substantially the role of the GBRMPA is the considerable tourist $ which is steadily increasing. We, as biologists, would hate to see the $ drive the management of the Authority. However, as long as the Authority continues in its current acceptable direction, the scientific community should strongly continue to support the Authority and work with it to improve management. In concluding this section, Whitehouse suggests the development of a separate "National Marine Resources Conservation and Management Authority" using the Resource Assessment Commission Inquiry into the Coastal Zone as providing the documentation on which to provide a national strategy to ensure the co-ordinated management and ecologically sustainable development of Australia's coastal zone. This Authority would encourage the development of joint Commonwealth/State (or Territory) arrangements to ensure a co-ordinated approach. However, Whitehouse recommends that GBRMPA should remain separate and distinct given the very special importance of the GBR. Also GBRMPA should retain the special features relating to the constitutional arrangements between the Commonwealth and Queensland related to the coastal and territorial waters of the GBR region. In other states they have been transferred to the respective State and Territorial Governments. This does not preclude the Authority providing some of its expertise on a consultancy bases to other State/Territory or Commonwealth agencies which are developing management plans for the coastal environment. In fact, this is already happening with GBRMPA playing a key role in the marine protected areas component of Ocean Rescue 2000 and it is extensively liaising with the States and ANCA in developing a national system of marine protected areas.

PROPOSALS FOR AN AUSTRALIAN NATURE CONSERVATION AUTHORITY AND GBRMPA

The McDonald Report (1989) recommended the development of ANCA which would include GBRMPA and ANPWS, however it appears that the report did not consider the current performance of GBRMPA. Following on from this report ANCA was created but without GBRMPA. Whitehouse supports this arrangement and concludes that strong and widespread support for the continual separate existence of GBRMPA in the light of the recommendations of the McDonald Review constitutes a ringing public endorsements of the existing organizational arrangements and of the general community satisfaction with the performance of GBRMPA from the Queensland Government, the tourism industry, the fishing industry, conservationists and scientists.

CONSERVATION MANAGEMENT

Whitehouse suggests that areas of the GBR region which are not included in the Park (areas along parts of the Queensland coast) should be regularly reviewed to ensure that appropriate management regimes operate in these areas so that no adverse effects occur within the Park.

Whitehouse reviews the sections of the Park and how some of the original ones have been amalgamated to form four sections, with revised names to be incorporated into the zoning plans. He discusses the development of specific management plans and area statements in areas of high or potentially high usage. Statutory recognition should be given to these management plans and they should be enforced by legal requirements much as zoning plans are. The GBRMPA has from its very inception been totally committed to public participation in all stages of development of zoning and management plans. While this increases the time taken to complete zoning plans, the final outcome is more likely to obtain public acceptance and recognition. It also means that most people accept the legislation. Law enforcement because of the sheer size of the area is, in reality, limited.

Whitehouse discusses the Permit and Environment Assessment provisions of the Act and identifies the substantial number of permits which are given and how the process has been changing. While accepting the need for permits, the processing of permits should not dominate the activities of GBRMPA. The time devoted should be equal to the benefits accruing to the GBRMP in terms of protection and management. The lack of management plans for many areas is creating and confounding the permit process.

Whitehouse then summarises the Magnetic Quay Marina Proposal which has already been the subject of a detailed inquiry by Whitehouse (1992). In the light of this failed development Whitehouse makes some recommendations for future permitting. These are: 1. increased public involvement in permit applications except in the case of research permits; 2. consideration given to increasing the duration of permits to generally 5–10 years; 3. the Authority should continue its efforts to prepare information packages specific to particular types of uses and activities to ensure that permit applications contain all the necessary information when they are lodged; 4. the Authority needs to address the implications and consequences of project interruptions due to financial difficulties of the permittee, so as to ensure that the Authority has a guaranteed access to sufficient funds to undertake clean up, and where possible, rehabilitation in the event of project collapse; 5. GBRMPA should develop and publish special guidelines for the implementation of environmental surveys of coral and marine environments (this has been progressing for some time and is to be welcomed); 6. where GBRMPA is relying on insurance to provide security for site rehabilitation, the Authority should seek independent advice from insurance brokers to ensure that adequate coverage has been provided; and finally that GBRMPA should regularly review the fees charged for permit applications so that the processing of permits is on a full cost recovery. I presume that this refers to all permits, except research permits, which are currently free and hopefully will remain free.

The Society has major reservations about point 1. Also, many of the issues raised by points 1–4 could be resolved for standard activities by the development of management and Area statements. Permits would be needed for special cases only; releasing staff for the resolution of permits for non standard activities. Points 6 and 7 are to be welcomed and could be of great use to other coral reef areas.

It has long been the policy of GBRMPA to be strongly committed to applied research to support the management process and it is reassuring that expenditure on research activities (almost 15% of its total budget) is the second largest component after day to day management. Whitehouse then goes onto reviewing the principles which the Authority has with regard to funding research which is mainly directed to principal programme areas in which it needs information for its management. The review suggests that the Authority has been quite successful in the management of scientific research. While ACRS would have no arguments with the areas highlighted by the Authority as needing research, or in the general conclusions by Whitehouse, it would strongly support the need for additional funding for research and the constant awareness of other areas to be included as priority as the need arises, such as the effects of fish farming using cages and potential introductions of exotic species from the discharge of ballast water. The Society would also support the recommendation that further efforts be made to communicate and implementate the findings to the day to day management staff and, where appropriate, involve such staff in the research programme. However, we would like to see this point expanded to include user groups and the general public. The newly created CRC for Reef Research is heavily involved in this process.

Whitehouse then discusses the day to day management including funding. This process has recently been reviewed by Gilmour *et al.* and summarized in the report (p. 123). The Society endorses the suggested changes to procedures. It should create greater communication between the Authority and QDEH (Queensland Department of Environment and Heritage — the Queensland Government Department responsible for this) for better day to day management.

Whitehouse discusses the procedure whereby the granting of permits is subject to review by the Commonwealth Administrative Appeals Tribunal (AAT). To date, only two appeals have been lodged, an appeal by Island Voice against the permit given for the construction of a tourist resort/marina complex by Magnetic Keys at Nelly Bay, Magnetic Island and an appeal by Dallhold Nickel Management Pty Limited against a refusal to grant a permit to offload nickel ore at Halifax Bay. ACRS was involved in the second appeal. Both appeals were subsequently withdrawn but only after considerable expenditure by the Authority, mainly with regard to legal advice. Whitehouse accepts that it is essential that an appeal system exists but considers the AAT is not the appropriate forum. This has now been accepted by GBRMPA. He suggests that the recent review of the failed Magnetic Island Marina Development is a more appropriate forum as it emphasized an informal and non-legalistic approach rather than the legalistic approach of AAT. For example, ACRS was able to present a submission to the inquiry on the failed Magnetic Keys Development in a relaxed informal meeting whereas although the Society felt very strongly about the Dallhold Nickel proposal and had many valid points to make, it was advised very early on that unless we employed legal counsel we could not tender such information to the AAT. At a Council meeting of ACRS it was obvious that we could not go ahead with our submission, as we could not afford it, and presumably there were other organizations who made a similar decision. The Society would therefore strongly support the recommendations of Whitehouse on this matter.

The final part of this section deals with whether or not the area over which the Authority has jurisdiction should be extended. There appears to be little support for it to be extended to include the Torres Strait as this would involve the Authority in the complexity of managing an area of international responsibility. However, there are valid reasons for extending the mandate to include the Coral Sea reefs. These are probably connected to the GBR and certainly the expertise of the Authority encompasses these reefs. Currently, only two of these reefs are protected as National Nature Reserves. They are Koringa Herald and Lihou and administered by ANCA.

RECREATION, EDUCATION AND USE OF MANAGEMENT

It is questionable whether any one foresaw the tremendous increase in tourism to the GBR region since the declaration of the Park and how this would impact on the management of the area. It has resulted in a major effort by GBRMPA to determine the impact of tourism on the reef, not only with regards to the development of resorts and on reef facilities but the varying requirements and expectations of the various sorts of tourists coming to the reef. GBRMPA co-ordinates the development of the coastal area adjacent to the GBRMP with the development on reef islands by regarding the area as a single unit. All this needs to be done while maintaining the long term viability of the reef. In order to do this the Authority has embarked on programmes to evaluate the impact of tourists on the reef and how these can be either managed or minimized. In addition monitoring programmes are being implemented to assess visitor impact and the results will need to be incorporated into future plans. Perhaps a point to make here is that the Authority has no other points of reference elsewhere in the world to draw from, rather, the Authority must develop its own data base and methods of implementing it. Whitehouse stresses that the Authority is at the forefront of tropical marine park management.

Whitehouse suggests that, with regard to shipping, legislation should be modified to require ship's masters to sign a written agreement to agree to. participate in any inquiries regarding the discharge of oil or other pollutants from their vessel within the area of the GBR this agreement would authorize a ship's agent to act on the master's and the owner's behalf in the event of legal proceedings. Currently it is possible for ships' masters to ignore requests to participate in such inquiries because of resource limitation, time or distance problems. It would also allow a ship to sail rather than wait for the proceedings.

The role of the aquarium is discussed and Whitehouse endorses its continued role which he regards as primarily educational. He suggests that the Authority must accept the need to run the Aquarium on a subsidized commercial basis because of its educational role.

COMMUNITY INTERACTIONS

The role and membership of the Great Barrier Reef Consultative Committee is discussed and certain recommendations are made. These are that the Queensland Marine Parks Consultative Committee for areas other than the reef should function separately from the GBR Consultative Committee. The GBR Consultative Committee should play a major role in providing lines of communication between the GBRMPA and the major groups of users of the Park. More interaction should occur between members of the Authority and the members of the Consultative Committee, currently most of the communication occurs at the Executive levels of GBRMPA. Perhaps the most important recommendations are for the Consultative Committee and GBRMPA to work together on developing a forward programme of issues and problems to be dealt with by the Consultative Committee. Secondly, the Consultative Committee needs to interact with user groups and stakeholders and to be seen as independent of GBRMPA. Such actions could well defuse potential conflict.

With regards to public participation and interaction with stakeholders, Whitehouse stresses this must continue and he recognizes the good working relationship between the Authority and research institutions involved in the GBR as well as with individual researchers. It is essential that this be continued and expanded. He also notes that to date communication with indigenous groups has not been as widespread as it should be, and he recommends that an active programme of training indigenous people for employment both within the Authority and in QDEH as well as improving communication with local groups be implemented. He suggests that "Aboriginal Marine Management Areas" be established and managed by a "Management Board" consisting mainly of Aboriginal representatives.

CO-ORDINATION AND EXTERNAL LIAISON

Basically this stems from the recognition that the GBRMPA provides a leading example of the management of a large multiple use marine protected area. Such requests have been received from numerous agencies both in Australia as well as overseas to provide advice and expertise. In addition GBRMPA is playing a major role in contributing to the international debate on the management of coral reefs and marine resources. While Whitehouse wonders about the long-term viability of this section of GBRMPA it seems to me as that it is an area of considerable potential for growth and source of funding. However, this must not occur at the expense of the management of the GBR. Although one could imagine that at times the experience acquired overseas may be directly relevant to the GBR.

Whitehouse notes that the GBRMPA has good working relationships with a variety of government departments and agencies at all levels, except notably with ANCA. The resolution of this conflict will require a clear determination of the respective roles and the limits of responsibility of each agency and a resolution generally of the appropriate management arrangements for the Commonwealth's marine responsibilities. Hopefully this will occur in the near future.

FUTURE DIRECTIONS

The key strategic issues which the Authority will face in the future are the management of an increasing number of tourists wishing to experience the reef at a variety of levels. Secondly the management of external impacts on the reef, such as pollution from nearby coastal areas, run off and excess nutrients entering the system etc. These two factors are likely to substantially increase the requirements for day to day management of the reef which will become more complex as pressure on the resources increases. The Queensland Government in its submission to the Inquiry is confident that the Authority has the necessary capacity to meet future needs without any significant changes. Let us hope that this is correct. However, to date the Authority has shown a willingness to adapt as shown in its recent Corporate Plan and the development of a Strategic plan for the Management of the GBR for the next 25 years. Hopefully, through its close working relationships with the users of the Park, signs of deterioration or changes in the marine communities will quickly filter back to the Authority in time for action to be taken. The reef, as demonstrated by its World Heritage status, should be protected and managed for time immemorial.

ACRS supports the context and recommendations of the Whitehouse report on GBRMPA and recognizes that steps have been taken to implement a number of the recommendations and to review direction and policy in light of the review. The new Chairman Dr Ian McPhail is taking on a series of new challenges for the Authority and has a track record for achievement in the community interests.

Finally the Society believes that Whitehouse's review addressed well the terms of reference and enforces the widely held belief that the Authority is fulfilling its responsibility to the management and protection of the Great Barrier Reef.

ACKNOWLEDGEMENTS

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A review of the review

To: Pat Hutchings and Dan Lunney

Thank you for the opportunity to comment on your review of the Whitehouse review of GBRMPA.

The report by John Whitehouse on the Great Barrier Reef Marine Park Authority and the review of that report by Dr Pat Hutchings are in my opinion very fair and competent documents. I have three comments which address both reports.

I believe that Australia needs a more efficient co-ordinating system for managing its coastal waters than presently exists. By "coastal waters", I mean all the waters within the jurisdiction of the state, territory or federal governments. My recommendation is that an Australian Coastal Waters Authority (ACWA) should be established, to be chaired by the Chair of the Great Barrier Reef Marine Park Authority (GBRMPA), with a representative of each state and territory government. This Authority should have the function of co-ordinating the investigation, planning, management and monitoring of our coastal waters, with the explicit mandate of ensuring that use of those waters is ecologically sustainable. The ACWA should have a small secretariat and should rely to the maximum extent practicable on the expertise within existing government agencies for performing its technical and administrative functions.

Both Mr Whitehouse and Dr Hutchings support increased attention to the involvement of Aboriginals and Torres Strait Islanders in the management of the Great Barrier Reef Marine Park (GBRMP). The GBRMPA has had such a policy for many years, but has never had the human resources to apply the policy to its satisfaction. It should be recognized that the meaningful involvement of these communities in complex, technical issues, using analytical and decision making processes that have not traditionally been used by them, requires special, additional resources provided explicitly and exclusively for that purpose.

Finally, it might be noted that, in addition to the areas noted in Dr Hutchings' report as having adopted variants of the GBRMP model, the USA (in Florida and California) and Western Australia have acted similarly.

Thank you for the opportunity to comment on these two reports.

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